

CENTENNIAL COMMUNICATIONS

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February 2, 2004

David Solomon, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Sixth Quarterly Report of Centennial Communications Corp.
On Phase II E911 Compliance**

Dear Messer's Solomon and Muleta:

Pursuant to the FCC's Order to Stay issued in CC Docket No. 94-102,¹ Centennial Communications Corp. ("Centennial") hereby files its sixth Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Because Centennial provides CMRS service in two distinct markets, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status.²

I. Puerto Rico/U.S. Virgin Islands

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands. Centennial has chosen a network-based solution to deploy Phase II E911 in this MTA. A single PSAP serves Centennial's entire Puerto Rican service area. On November 4, 2003, Centennial received a request for Phase I and II E911 service from this sole PSAP, and is working towards deploying both Phase I and Phase II E911 service in Puerto Rico by May 2004.

¹ FCC 02-210, released July 26, 2002.

² See *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

Centennial also provides service to the U.S. Virgin Islands of St. Croix and St. Thomas under its B Block license for MTA 25. Each island is served by a single PSAP; however neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

II. Domestic Markets

Through five different subsidiaries,³ Centennial holds licenses to provide digital cellular service in 30 markets in the Midwest and Southern United States. Centennial provides cellular service in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial has chosen a network-based solution offered by Andrew Corporation (formerly known as Grayson Wireless) to deploy Phase II E911 in its domestic markets.⁴

Phase I Service – Since the filing of our last Quarterly Report, Centennial has made significant progress initiating Phase I service to PSAPs. We have initiated Phase I service to six PSAPs in Louisiana and seven PSAPs in Michigan since November 2003. As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. Phase I E911 service has been fully deployed in our Texas markets, and as of March 2003, Phase I E911 service has been fully deployed to all PSAPs in Indiana where Centennial operates. By the filing of our last Quarterly Report, we had completed Phase I implementation for all PSAPs in Mississippi that had requested Phase I service. Centennial also notes that, to date, we have not received any valid requests for Phase I (or Phase II) E911 service from PSAPs in the state of Ohio. We continue to implement Phase I service to all PSAPs in Louisiana, Michigan and Mississippi that have submitted a Phase I request to us, and that are technically operational. As indicated in the attached Excel spreadsheet, while we have experienced some Phase I implementation issues in Michigan, we are working with our E911 vendor and each of the PSAPs to resolve these issues.

Phase II Service - As the Commission is now aware, we are implementing Andrew Corporation's "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets.⁵ As detailed in the attached Excel spreadsheet, since the filing of our last report, we have activated Phase II service in nine markets in Indiana, and are beginning the testing phase this week in Bluffton, Indiana. Centennial also is in the pre-deployment engineering stage of the Phase II implementation process for ten markets. Based on our conversations with various PSAPs, we expect to receive two more PSAP requests for Phase II service in the upcoming quarter. Finally, we have received "invalid" requests for Phase II service from nine PSAPs (seven of which are located in Indiana, and two of which are located in Louisiana.)

³ Baucé Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

⁴ See Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

⁵ *Id.*

As we have previously reported, Centennial still has not received any Phase II E911 service requests from PSAPs in Mississippi, Ohio or Texas. We have now received seven requests for Phase II service from Michigan PSAPs. Six of those requests were received after we filed our last Quarterly Report, and we deployed Phase II service in Saint Joseph's County by our projected late September deployment date for that market. In Louisiana, we have received three Phase II requests from PSAPs (two of which are invalid, one of which was deployed in October). In Indiana, we continue to work with the Indiana Enhanced Wireless 911 Board and its Cost Recovery Group ("Indiana Board") in coordinating Phase II E911 deployment, and with the PSAPs in Indiana that have not yet perfected their Phase II requests. We are quite pleased with our Phase II implementation progress in Indiana, where we implemented Phase II E911 service in eleven markets January 2004. While Centennial did not deploy Phase II service to any PSAP by the March 1, 2003 deadline, we did and continue to negotiate mutually acceptable deployment target dates with each PSAP that has submitted a valid request for Phase II service. In addition, we continue to work cooperatively with these PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates.

In sum, because Centennial has negotiated mutually acceptable Phase II implementation schedules with each of the PSAPs in its domestic markets that had submitted valid Phase II requests,⁶ Centennial presently is in compliance with all applicable Phase II deployment benchmarks.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me, or Terry Cavanaugh at Cole, Raywid & Braverman, LLP, counsel for Centennial, at 202-828-9857.

Sincerely,

/s/ Lourdes L. Lucas

Lourdes L. Lucas
Vice President, Legal Affairs
Centennial Communications Corp.

cc: Thera Bradshaw, President
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351 N. Williamson Blvd.
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⁶ See *Order on Reconsideration, Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas*, FCC 02-318, released November 26, 2002.

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